

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNIFER P. SCHWEICKERT,

Plaintiff,

vs.

HUNTS POINT VENTURES, INC.; HUNTS
POINT VENTURE GROUP, LLC; CHAD
and ELIZABETH RUDKIN, and their marital
community comprised thereof; JOHN DU
WORS and AMBER DU WORS, and their
marital community comprised thereof; and
DOES 1-4,

Defendants.

No. 13-CV-675RSM

DECLARATION OF SAM B.
FRANKLIN IN SUPPORT OF
DEFENDANT JOHN DU WORS'
OPPOSITION TO PLAINTIFF'S
MOTION TO QUASH AND/OR
MODIFY SUBPOENAS

NOTE ON MOTION CALENDAR:
September 19, 2014

I, Sam B. Franklin, being an adult over the age of 18 and of sound mind do hereby
declare under the laws of perjury in the State of Washington, the following facts to be true and
correct:

1. I am one of the attorneys representing Defendants John Du Wors and Amber
Du Wors.

2. I did not assume the attorney client privilege had been waived between Mr.
Yurchak and Jennifer Schweickert or Mr. Yurchak and Mark Phillips or Mr. Keane and Joyce
Schweickert in sending the Apple and Google Subpoenas in this matter. I am seeking

DECLARATION OF SAM B. FRANKLIN IN SUPPORT
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PLAINTIFF'S MOTION TO QUASH AND/OR
MODIFY SUBPOENAS - 1
13-CV-675RSM
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P.S., Inc. · Pacific Northwest Law Offices

1800 One Convention Place · 701 Pike Street · Seattle · WA · 98101-3929
Tel. 206.624.7990 · Toll Free 877.624.7990 · Fax 206.624.5944

1 communications particularly between these various parties; Jennifer Schweickert and Joyce
2 Schweickert; Joyce Schweickert and Mark Phillips.

3 3. Attached to this Declaration as **Exhibit 1** is a true and correct copy of the
4 Declaration of Service of both the the Google and Apple Subpeonas.

5 4. Attached to this Declaration as **Exhibit 2** is a true and correct copy of email
6 correspondence dated September 4, 2014 between Pam DeVet and Reed Yurchak.

7
8 DATED this 15th day of September, 2014.

9
10 By: s/Sam B. Franklin
11 Sam B. Franklin, WSBA No. 1903
12 Lee Smart, P.S., Inc.
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18 Attorneys for Defendants Du Wors
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CERTIFICATE OF SERVICE

I hereby certify that on the date provided at the signature below, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals:


Mr. Reed Yurchak
Law Office of Reed Yurchak
40 Lake Bellevue Drive, Suite 100
Bellevue, WA 98005
yurchaklaw@gmail.com

Mr. Mark D. Kimball
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10900 Northeast Fourth Street, Suite 2030
Bellevue, WA 98004
mark@mdklaw.com

Mr. Joel B. Ard
Foster Pepper, LLC
1111 Third Avenue, Suite 3400
Seattle, WA 98101
ardjb@foster.com

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 15 day of September, 2014, at Seattle, Washington.



Kimberly J. Paul, Legal Assistant

DECLARATION OF SAM B. FRANKLIN IN SUPPORT
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